

Defendant Michael Clay is a resident of the State of Georgia.

Defendant Beeline Carriers, LLC is a limited liability company organized and incorporated under the laws of the State of Georgia, and has its principal place of business in the State of Georgia. Defendant Beeline Carriers, LLC has 2 member(s), who are resident(s) of the State of Georgia.

This action has been brought by the Plaintiff against the Defendants for the alleged accident which occurred in Jasper County, South Carolina.

3. Venue is proper in this matter in the Beaufort Division of this Court in accordance with 28 U.S.C. §1441(a).

4. Upon information and belief, the amount in controversy in this matter exceeds \$75,000.00 as the Plaintiffs allege that as a result of this vehicle accident, they have suffered permanent injuries, requiring medical treatment and related expenses and are asserting a loss wage claim. In addition, the Plaintiff's attorney indicated that the value of these claims exceed \$75,000 per an inquiry from Defendant's attorney.

5. Defendant has filed no pleadings in this action with the Court of Common Pleas for the State of South Carolina in response to this Complaint; however, Defendant's Answer to the Plaintiff's Amended Complaint is filed herewith contemporaneously.

6. Defendant will furnish a copy of this Notice of Removal to the Clerk of Court for Jasper County.

Signature page to follow

Respectfully submitted,

SWEENY, WINGATE & BARROW, P.A.

s/Mark S. Barrow

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Marshall C Crane Fed. I.D. No. 12455

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ATTORNEYS FOR THE DEFENDANTS

Columbia, South Carolina

September 26, 2022